

Exhibit 1

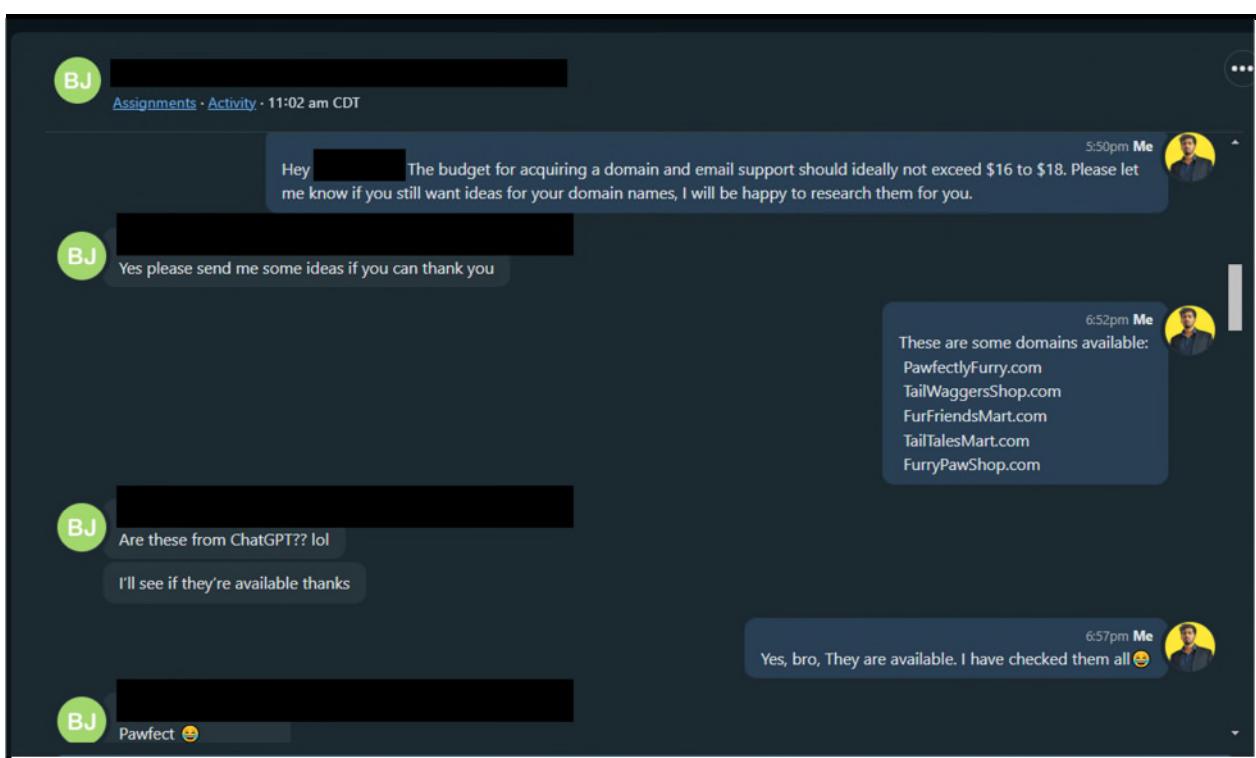
**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION)	
)	
Plaintiff)	
)	
v.)	Case No. 2:24-CV-4949
)	
EMPIRE HOLDINGS GROUP LLC,)	
also d/b/a ECOMMERCE EMPIRE)	
BUILDERS and STOREFUNNELS.NET,)	
a limited liability company, and)	
PETER PRUSINOWSKI Individually and)	
as an officer of Empire Holdings Group LLC)	
)	
Defendants)	

DECLARATION OF ALI AKBAR GULSHAN

1. I am the Chief Operating Officer for E-Commerce Empire Builders and I have personal knowledge as to the facts set forth herein.
2. This declaration provides a detailed overview of the steps that take place once a client joins our program. The first action is to schedule an introductory call with one of our team members. During this call, we walk the client through the upcoming stages of the process, ensuring they understand what to expect and how we will work together moving forward. This call is designed to introduce them to the team, explain the workflow, and address any initial questions they may have regarding next steps. It is also an opportunity to outline what we will need from the client and what they can expect from us. A critical part of this conversation involves helping the client select a product niche for their business, which helps define the overall direction of the project. This decision is fundamental as it shapes the focus of the business moving forward.
3. **Helping Clients with Niche Selection:** Niche selection is a crucial and deeply personal step in how a business owner defines their path toward building an online business with our assistance. In all of our client communications and social media content, we emphasize the importance of choosing a niche that the business owner is genuinely passionate about—something that resonates with their interests and aligns with products they would personally use or recommend. We encourage our clients to reflect on their hobbies and personal interests, as this not only makes the business journey more enjoyable but also more authentic.

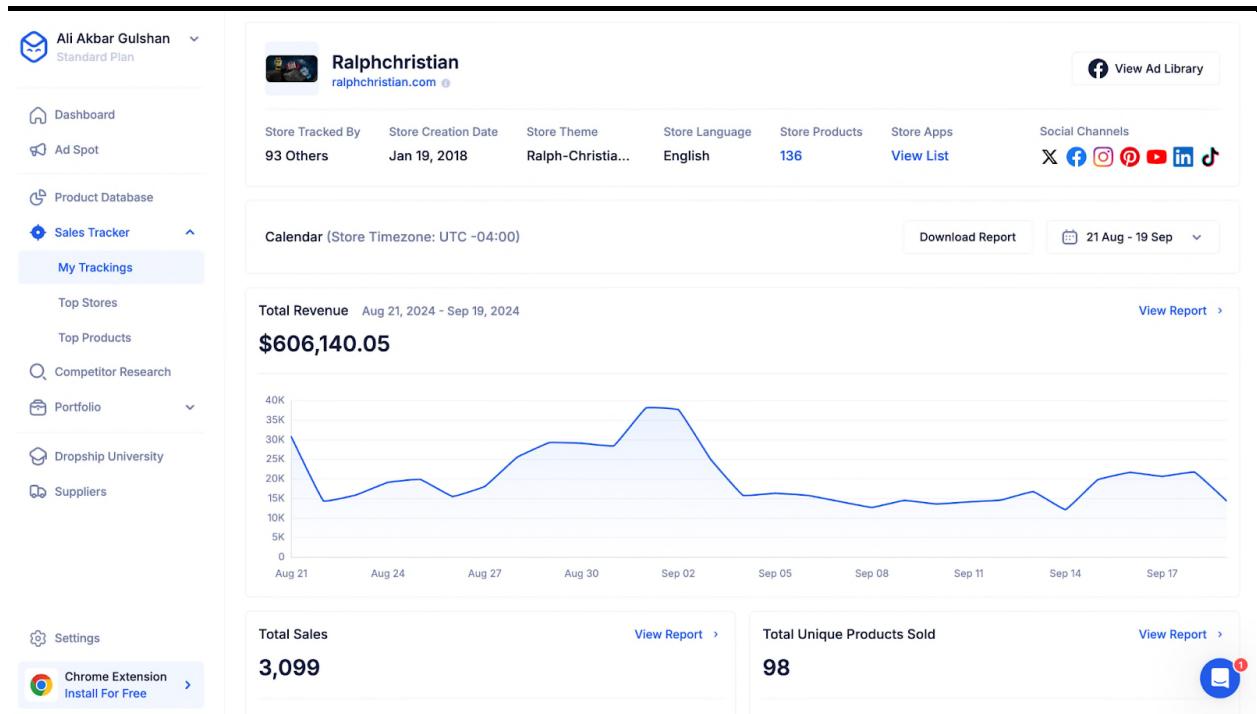
4. For instance, if a client is passionate about pets and takes pride in grooming their own dog regularly, we might suggest a niche like dog grooming. This could include products such as grooming kits, brushes, shampoos, or even stylish dog accessories—items that the client would naturally feel connected to and could confidently recommend. In cases where clients need additional guidance, we actively help by suggesting potential hobbies or niches they could explore. Once a client finalizes the direction for their niche, we pass that information on to our team, who then begins the in-depth research process and client collaboration to identify the best opportunities within that niche.
5. **Helping Clients with Domain Selection:** The next step involves providing the client with a curated list of available domain names based on the niche they selected. Our team conducts a thorough research to find suitable domain names that align with the client's business focus and are available for purchase. For example, if the client chose dog grooming as their niche, we might suggest domain names like **PerfectPawsGrooming.com**, **StylishPupCare.com**, or **DoggieDeluxeGrooming.com**. We typically offer multiple options, allowing the client to choose the one they feel best represents their brand. Once the domain is chosen, we guide the client through setting up the essential assets needed to run a successful online business. This includes step-by-step instructions to the client about purchasing the domain, creating a professional business support email account, working with a website builder, and working with a platform that enables them to source eCommerce products. Our advice on these initial steps helps the client to develop a strong foundation for their business operations.
6. An example of correspondence showing how we help to clients with selecting a domain name is below.

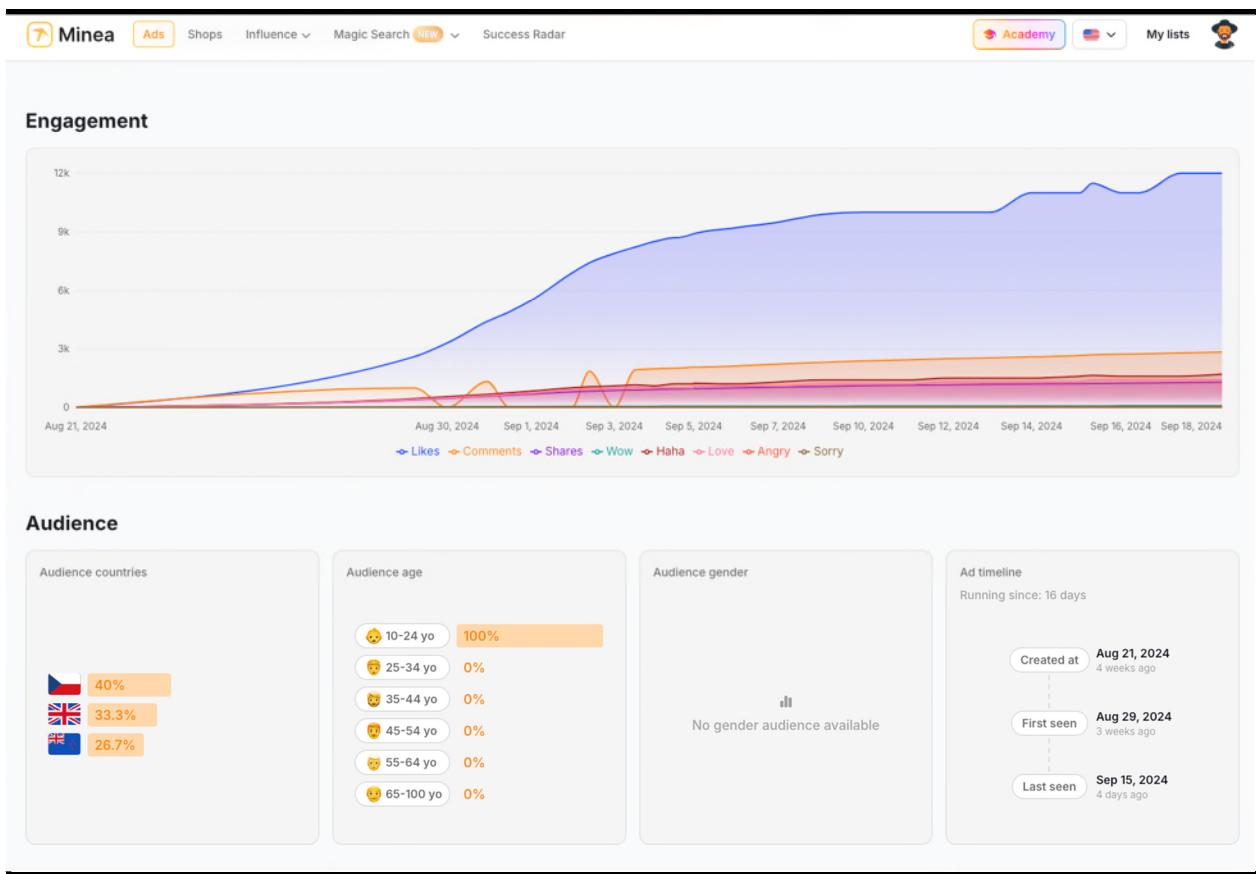
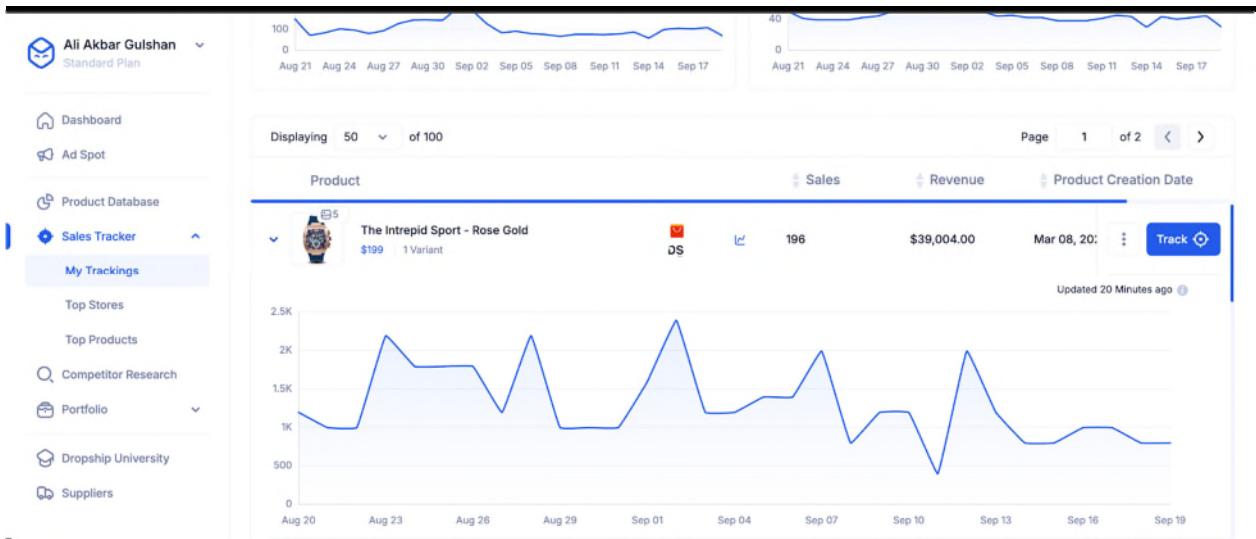


6. All of these assets are procured and owned by our client. The instructions provided detail exactly what they need to do. We emphasize to clients that it's important for them to complete this exercise themselves so that they fully understand where these valuable assets are stored and how to access them. For clients who are less tech-savvy, we are always available to assist through video conference calls, where we can guide them step-by-step in setting up these essential assets.
7. **Helping Clients with Third Party Tools:** After the client selects their niche is selected and implements important foundational assets, we move on to the next critical phase. This phase focuses on helping the client set up the additional technical assets required to build and operate their business. A key component of this is assisting them in creating access to online social media advertising through the Meta platform, which enables them to advertise on Facebook, Instagram, Messenger, and other Meta-owned properties. Specifically, we guide them in setting up essential tools such as a Meta Business Manager, Meta Business Page, and Meta Ad Account.
8. **Helping Clients with Setting Up Payment Processing:** Additionally, we help clients set up a payment processor, which allows them to accept payments from customers. In most cases, this involves creating a Stripe account and a PayPal account. Beyond setup, we also provide guidance on how to link these various assets together. For example, we instruct them on how to point their domain name to their website, connect their payment processors to their website builder, and verify their Meta assets, including the business manager, ad account, and business page.
9. **Helping Clients with Trademarks and Policies:** We also provide advice on how to create a business trademark and help clients to establish essential business policies, such as a refund policy, terms of service, and privacy policy. After the client has completed the setup of these critical assets, with the help of our one-on-one coaching, consulting, and video tutorials, they have a follow-up call with one of our team members. During this call, we verify that all steps have been properly completed, ensure nothing has been overlooked, and assist the client with any troubleshooting if they are stuck at any stage of the setup process.
10. **Helping Clients with Market Research:** While the client is in the process of securing the necessary assets, our team simultaneously begins conducting in-depth market research and preparing tailored marketing assets based on the client's selected niche. Below is a breakdown of how we create and share each component.
11. A dedicated team member is assigned to research products specifically for the client. This process involves analyzing various market trends and performance metrics to identify top-selling eCommerce products that are both easy to source and likely to generate sales. Our research methods include leveraging paid tools such as *minea.com* and *dropship.io*, which allow us to pinpoint high-performing products by analyzing sales volume, ad performance, and other key data points. This ensures our clients are set up with products that have the best shot at success in the current market.

12. Each client is supplied with a curated selection of products, which include a "star" product—typically the main focus of the store—as well as upsell and digital products designed to act as profit maximizers. For example, in the case of a client who selects the pet niche, we might recommend a high-demand product like a dog grooming kit as the star product. In addition, we could suggest complementary upsell products such as specialized dog shampoos or brushes. Digital products like an eBook on "How to Keep Your Pet's Coat Shiny and Healthy" could also be included to further increase profits with minimal additional costs.

13. These are examples of the data generated by our research tools:





14. Helping Clients with Copywriting Research: To effectively sell products online, it's essential to provide clients with compelling product and website descriptions that position their offerings in the best light. Our team conducts in-depth research into the target customer base, identifying their needs, motivations, and preferences. With this

knowledge, we craft persuasive copy that helps our clients resonate with their audience and promote their products more effectively.

15. The copy we provide includes:

- **Home Page Copy:** Engaging content that introduces the client's brand and creates an immediate connection with visitors.
- **Landing Page Copy:** Conversion-focused copy designed to highlight the key features and benefits of the client's star product, encouraging visitors to make a purchase.
- **Upsell Pages Copy:** Strategic text for upsell offers, encouraging customers to add complementary products to their orders, increasing the overall order value.
- **Email Copy:** Follow-up sequences, abandoned cart emails, and promotional emails aimed at re-engaging potential customers and driving additional sales.
- **Advertising Copy:** Compelling social media ad copy optimized for platforms like Facebook and Instagram to capture attention and generate interest.

This is an example of copy researched and prepared for a client:

The screenshot shows a Google Docs document with the title "HOMEPAGE". The content includes:

- Headline:** Welcome To [REDACTED]
- Subheadline:** Empowering families with reliable emergency preparedness gear to ensure safety and peace of mind.
- Bullets:**
 - Our Customer Appreciation Sale - 70% Off + Free Shipping!
- Text:** Illuminate the path to safety with the ProBeam Emergency Light. Designed for life's unpredictable moments, it offers a powerful beam and versatile settings to tackle any situation. Whether you're camping, navigating a storm, or preparing for emergencies, trust ProBeam to deliver unmatched brightness and reliability when you need it most. Don't be left in the dark—equip yourself with ProBeam today.
- Text:** Special Offer For [REDACTED] Customers
- Text:** Stay prepared for anything with the ReadyGuard Essentials Club! Each month, receive expertly selected emergency gadgets and accessories delivered right to your door. From must-have tools to life-saving gear, our club ensures you're ready for any situation. Join today and safeguard your future with the ultimate in preparedness!
- Text:** Got Questions? We'd love to hear from you!
- Text:** Whether you're shopping with us for the first or the tenth time, we're here for whatever you need! Simply send us a quick message at [REDACTED] and we'll reply as soon as possible!

At the bottom, there is a section titled "LANDING PAGE URL" with the text "-ProBeam Emergency Light-". Below that is the heading "Landing Page - FE Product".

16. Helping Clients with Creative Assets: Our dedicated team of designers is responsible for creating all the visual and functional assets that complement the copywriting and drive the client's business forward. These creative assets include:

- **Website Pages**
- **Landing Pages**
- **Upsell Pages**
- **Emails**
- **Product Images**
- **Advertising Images**
- **Advertising Videos**

17. Each of these elements follows a meticulous design and creation process. Our goal is to deliver high-quality assets that reflect a premium level of execution, ensuring that our clients can attract and engage the high-end customers they aim to serve.

18. Once these creative assets are designed and integrated into the client's website builder, the client is given access to review everything before it goes live. This review phase allows the client to collaborate with our team, provide feedback, and make changes to fine-tune the look and feel of the assets to match their vision.

19. The process is designed to be collaborative, so clients have the opportunity to discuss the design choices, suggest alterations, and ensure that the final product fully aligns with their brand's aesthetic and business goals.

20. These are examples of two client's creative assets:



21. **Client Check-In, Training, and Communication:** Throughout the research and creation process, we ensure regular communication with our clients by conducting a check-in to see if they need assistance with their to-do list and to confirm that everything is progressing as planned. During this stage, we emphasize the importance of completing the mandatory training necessary to successfully operate an online business. This training is provided through our **Ecommerce Empire Academy**, a comprehensive video library that offers step-by-step guidance on how to start, build, and launch an online business.
22. Each client is granted free access to the academy and can progress through the training at their own pace. We strongly encourage clients to familiarize themselves with all aspects of running an online business through these tutorials, as they cover crucial areas that are essential for success. Additionally, we remain available throughout the process to address any questions or concerns clients may have, ensuring they feel supported and confident as they build their business.

the world use into yours to keep your business moving forward!

Before you attend your launch call which you can schedule at your convenience, it is crucial that you have gone through the entire Ecommerce Empire Academy training.

Without the proper training and knowledge about running your online business, it could get really overwhelming and you may inadvertently come in the way of your business's growth..

It would be like driving a formula one race car without getting your license?

The Ecommerce Empire Academy is a mandatory training for anybody planning on running a successful ecommerce business online and we expect you to have gone through it entirely before attending the launch call and turning your ads on.

We do expect you to know how to fulfil your orders when they come in, how to run and scale ads, and how to run and operate a funnel and manage costs associated, all topics that are included inside of the academy.

If you haven't already, now is the perfect time to start going through the entire academy, even if you've already browsed it once before. That way you're completely ready to grow and scale your business!

Feel free to hit reply and talk to me if you have any further questions.

Thanks!

Chris Cabral 8:07pm
I'm not finished with the tasks need help with finishing it

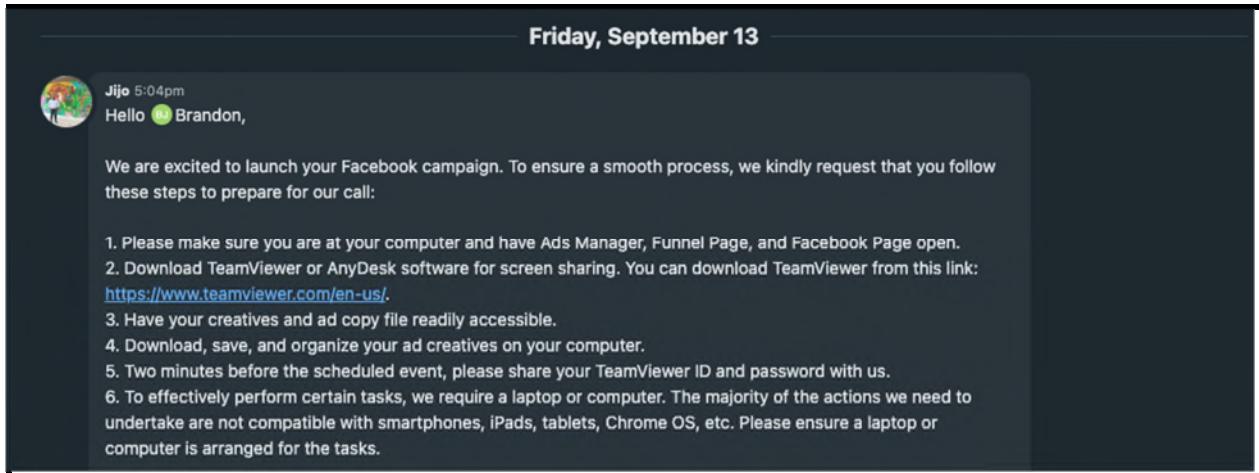
Saturday, September 25 2021

1:03pm Me
Hey Chris! How can we help?

23. **Launch Call and Ad Setup:** Once the client confirms that they have completed their setup tasks, and our team has finalized the marketing research and asset creation, we proceed to organize a "**Launch Call**". This is a crucial step where we assist the client in launching their marketing ads to reach prospective buyers.

24. During this call, our dedicated **Media Buying Team** works directly with the client, typically via screen share, to guide them through the entire ad setup process. This includes helping the client define and identify their target market, assisting with uploading the ads, and ensuring all the necessary settings are in place for a successful campaign. The ads are then launched online, positioning the client's products to reach their ideal audience effectively.

25. This hands-on approach ensures that clients are well-supported during the most critical phase of their business launch—advertising to potential customers.

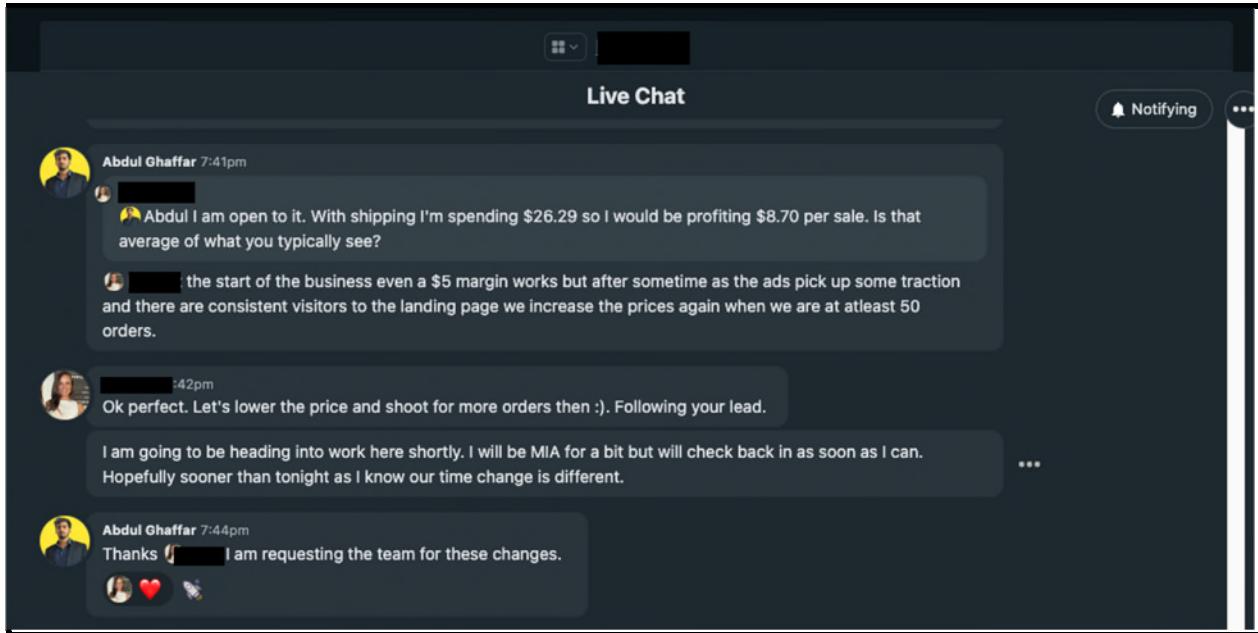


26. **Post-Launch Consulting and Ongoing Support:** Once the launch call is complete, our **consulting services** enter into full swing. All of our consulting is conducted via a platform called **Basecamp**, which allows clients to live chat with our entire team, providing seamless access to answers and support for any questions they may have. This live chat feature includes SMS and text options, making communication both flexible and convenient.

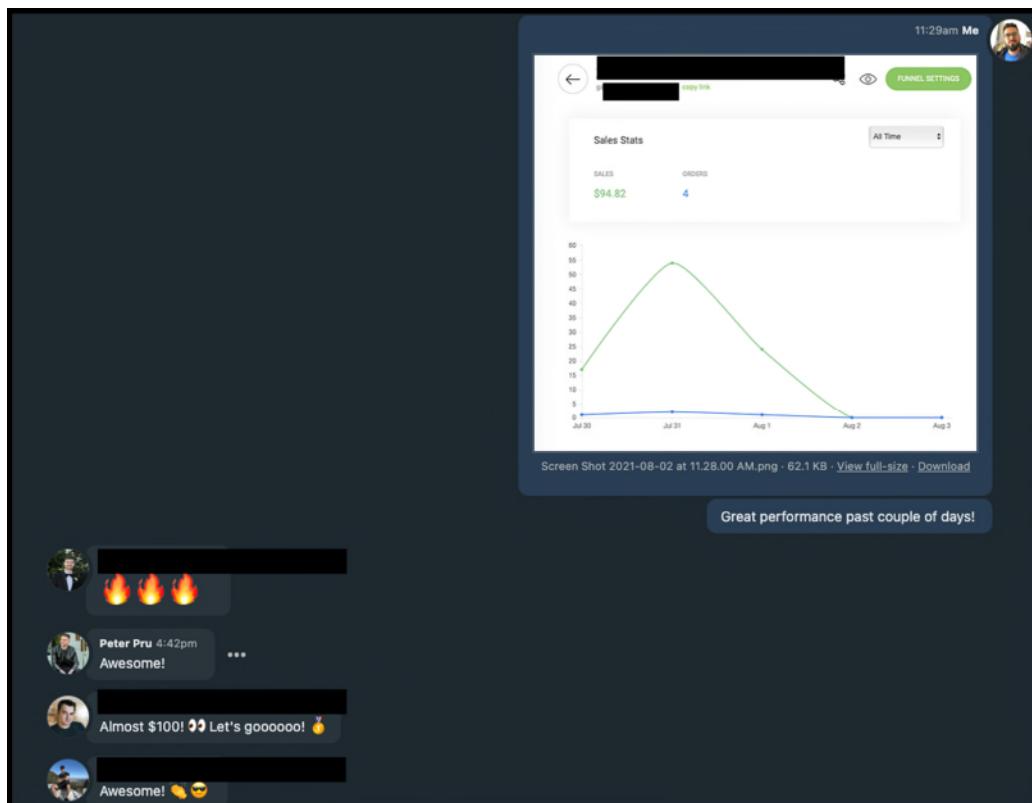
27. Additionally, we host **three weekly group calls** where clients can connect directly with our consultants. These sessions are designed to be interactive and informative. Our consultants typically kick off these calls by discussing new and noteworthy trends in the world of eCommerce and online business. Following this, we open the floor to a **Q&A session**, where clients are encouraged to ask any questions related to their business.

28. Clients can also share their screens to give our consultants a real-time view of their business data and performance metrics. Our consultants then provide live feedback and actionable insights, helping clients understand how to drive improvement and growth in their specific businesses.

29. One of the key benefits of these group calls is the opportunity for clients to learn from one another's experiences. This collaborative environment fosters peer-to-peer learning, allowing clients to exchange ideas and strategies that have worked for others in the same space.



30. Once a client receives their **first order**, our team collectively celebrates this momentous milestone, recognizing it as a significant achievement in the journey of building their business. The first sale is a pivotal moment and represents a major accomplishment for the business owner.



31. Following this milestone, we guide clients through the next crucial steps: **order management and fulfillment**. We provide detailed information about the relevant suppliers, along with step-by-step training on how to **process and ship products** efficiently. Additionally, we offer guidance on managing customer inquiries in their **support inbox**, ensuring clients are equipped to handle communication with their buyers professionally and effectively.
32. Once the ads are live and orders start coming in, the landscape of the client's business becomes very dynamic. This is where our consultants play a key role in supporting clients with their daily questions and challenges. Each client is assigned a **dedicated account executive** who manages all communication and ensures the client's needs are met. Clients are encouraged to maintain open communication with their account executive, who is available via **live chat** and for **one-on-one Zoom sessions** from **9 AM to 5 PM Eastern Standard Time**.
33. These account executives work closely with clients, providing personalized consulting on the **day-to-day operations** of their business. Their role is to help clients **optimize their revenue**, guide them through any necessary adjustments, and offer insights to keep the business on a path of growth and success.

The screenshot shows a Calendly booking page for a "30 Minute Meeting" with Abdul Ghaffar. The title "30 Minute Meeting" is at the top left, followed by a clock icon and "30 min". To the right is a "Select a Date & Time" section. The date is set to September 2024, with the 20th highlighted in blue. The time slots are listed in 30-minute increments from 12:00 to 15:30. The "Time zone" dropdown is set to "Central Time - US & Canada (11:38)". At the bottom, there are links for "Cookie settings" and "Report abuse". A "POWERED BY Calendly" logo is in the top right corner.

MON	TUE	WED	THU	FRI	SAT	SUN
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

Select a Date & Time

September 2024

Friday, September 20

12:00

12:30

13:00

13:30

14:00

14:30

15:00

15:30

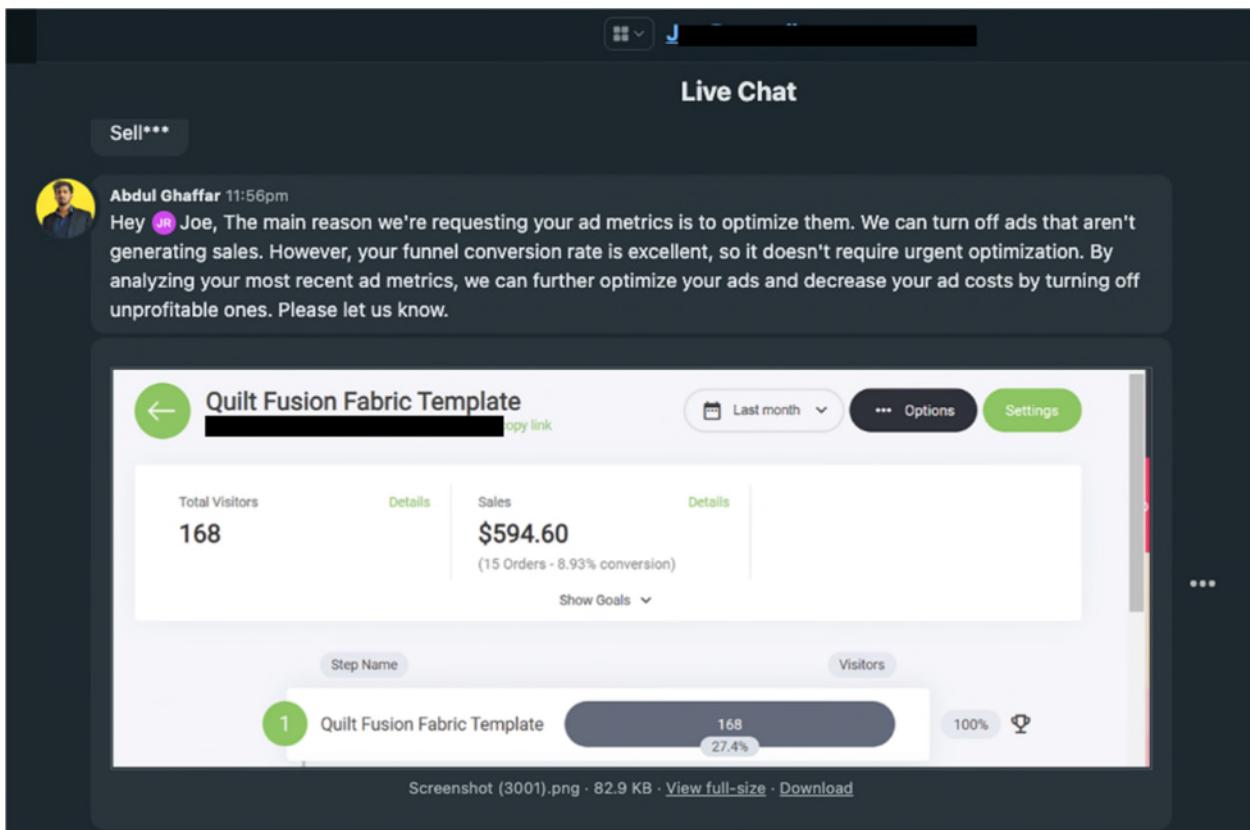
Time zone: Central Time - US & Canada (11:38)

Cookie settings Report abuse

POWERED BY Calendly

34. A core aspect of the **Empire Builder promise** is our commitment to supporting clients, particularly if the first launch does not go as planned. Although the products we select are backed by solid research, the success of an online business can often depend on external factors, such as how social media platforms handle advertisements. These platforms dictate which ads are shown to prospects and how effectively they reach the desired audience, often based on the advertiser's budget.

35. If our clients encounter challenges due to these dynamics, we promptly move their business into the **optimization stage**. During this phase, we work closely with the client, carefully reviewing data to identify changes that can improve performance and increase revenue. We focus on refining various elements to stabilize sales and profits, including providing **updated products**, adjusting the **landing page**, enhancing **advertising copy**, and creating new **advertising creatives**. Our goal is to ensure the client gets the best possible results even after encountering initial hurdles.

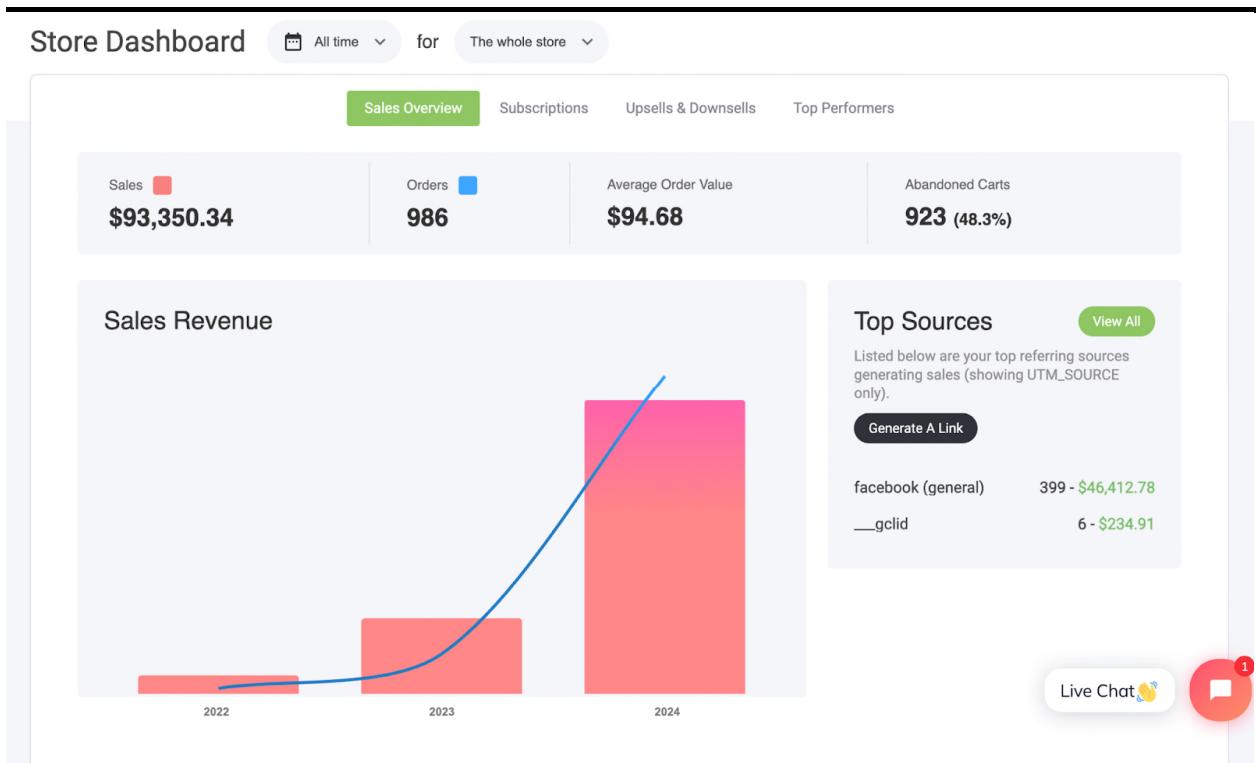


36. Throughout the process, clients have the flexibility to choose any team they prefer to work with. We have routinely collaborated with clients' chosen media buyers, marketing managers, and eCommerce experts, onboarding them onto our Basecamp platform and providing our consulting services to ensure they can fully benefit from our expertise. Alternatively, clients also have the option to hire our in-house team for extended services such as **paid media marketing**, **email marketing**, **social media marketing**, **influencer marketing**, and other tailored services that align with their business needs.

37. **In conclusion, our program is centered around providing continuous, expert consulting and strategic guidance to ensure the successful launch and growth of our clients online business.** From the very beginning, we work closely with our clients, guiding them through niche selection, securing key assets, and developing comprehensive marketing strategies. However, the real value of our program lies in the ongoing consulting we offer post-launch, where we help clients navigate the complexities of digital marketing, product optimization, and revenue growth. Our consulting services are tailored to address each client's unique needs, providing personalized insights, one-on-one support, and a collaborative approach to problem-solving. Whether clients choose to work directly with our team or bring in their own experts, we ensure they have the knowledge, tools, and strategies to succeed in the dynamic landscape of eCommerce. Ultimately, our goal is not just to launch businesses, but to empower clients with the strategic consulting needed to build sustainable and profitable enterprises.
38. **Understanding Dropshipping, More Than Just Fulfillment:** Dropshipping is a fulfillment method that allows businesses to sell products without holding inventory. When a customer places an order, the retailer purchases the product from a third-party supplier, who then ships it directly to the customer. While this method offers advantages like reduced overhead and ease of scaling, it's important to understand that dropshipping is just one part of a larger eCommerce strategy.
39. The real key to success in dropshipping lies not in simply fulfilling orders, but in effectively marketing products, targeting the right audience, and selling at a low cost per sale (CPS). By minimizing advertising and customer acquisition costs, retailers can ensure they generate strong profit margins. The ability to choose reliable suppliers who can quickly and efficiently ship products to customers is critical to maintaining a smooth operation and building a long-term, profitable business.
40. **Our Own eCommerce Dropshipping Business, Practicing What We Preach:** Our in-house dropshipping business serves as an experimental platform, enabling us to test new and innovative ideas in the ever-evolving world of eCommerce. From creative marketing approaches to optimizing supplier relationships and testing various fulfillment models, we stay on the cutting edge of dropshipping practices.
41. This experimentation allows us to identify key strategies that are proven to work in today's market. Every concept we test is implemented with precision, and the results are carefully measured. Once we validate a strategy, we refine it further before sharing it with our clients. Whether it's identifying new high-converting product niches, crafting compelling advertising campaigns, or optimizing shipping times, our hands-on experience informs every piece of advice we offer.
42. **Turning Insights Into Client Success:** One of the greatest benefits of running our own eCommerce dropshipping business is that we are able to offer our clients insights that are grounded in reality, not theory. We understand the daily challenges, from fluctuating ad costs to supplier reliability, and we tailor our consulting services to help clients navigate these challenges effectively.

43. By leveraging our own data, we help clients not only avoid common pitfalls but also seize opportunities that we know have been successful. This direct feedback loop ensures that the advice we give is practical, timely, and based on firsthand experience. Whether it's improving cost per acquisition or enhancing customer retention, our dropshipping expertise helps clients build solid, scalable businesses.

44. **Proven Strategies, Real Results:** Our own dropshipping business serves as a “proving ground” where we continually experiment, optimize, and adjust strategies to align with current market trends. By doing this, we ensure that our clients are receiving up-to-date, effective tactics. We take pride in the fact that the methods we employ for our own store are the same strategies that we share to help our clients grow their businesses. Our clients benefit from strategies that we've honed and perfected, giving them the tools they need to build a sustainable, scalable online business. With Empire Builders, the advice we provide is based on real results, designed to help clients achieve long-term success.



All orders • 988 Orders

Invoice No	Customer Name	Total	Paid	Status	Created	Payment
989	[REDACTED]	\$39.97	Paid	Pending	September 19, 2024 12:38	Stripe
988	[REDACTED]	\$99.91	Paid	Pending	September 19, 2024 00:51	Stripe
987	[REDACTED]	\$39.97	Paid	Pending	September 19, 2024 00:33	Stripe
986	[REDACTED]	\$79.94	Paid	Pending	September 19, 2024 00:20	Stripe
985	[REDACTED]	\$89.91	Paid	Shipped	September 18, 2024 13:10	Stripe
984	[REDACTED]	\$39.97	Paid	Shipped	September 18, 2024 11:55	Stripe
983	[REDACTED]	\$39.97	Paid	Shipped	September 18, 2024 11:35	Stripe
982	[REDACTED]	\$69.91	Paid	Pending	September 18, 2024 09:50	Stripe

Live Chat 1

I hereby declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct to be the best of my information, knowledge, and belief.

September 19, 2024

Ali Akbar Gulshan
Chief Operating Officer,
E-Commerce Empire Builder